

KG

KLEINMAN GINZBERG LLP

ONE OLD COUNTRY ROAD, SUITE 320  
CARLE PLACE, NEW YORK 11514  
TEL: (516) 951-0955

[WWW.KLEINMANGINZBERG.COM](http://WWW.KLEINMANGINZBERG.COM)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 11/21/2023

November 20, 2023

**VIA CM/ECF & EMAIL**

The Honorable Stewart D. Aaron  
United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 11 C  
New York, New York 10007-1312

Application DENIED WITHOUT PREJUDICE. Motions to seal must comply with the procedures outlined in Sections II(B)(3)/III(E) (Redactions and Filing Under Seal Through ECF) of Judge Aaron's Individual Practices. SO ORDERED.

Dated: November 21, 2023



Re: *Kumaran et al. v. National Futures Association*, Case No. 1:20-cv-03873  
*Kumaran et al. v. ADM Investor Services et al.*, Case No. 1:20-cv-03668  
*Kumaran et al. v. Vision Financial Markets et al.*, Case No. 1:20-cv-03871

Dear Judge Aaron:

I am a Partner at Kleinman Ginzberg LLP ("KG LLP"), which represents Plaintiffs Nefertiti Risk Capital Management, LLC ("NRCM"), Nefertiti Asset Management, LLC ("NAM"), and Nefertiti Holding Corporation ("NHC") (collectively, the "Nefertiti Entities" or "Corporate Plaintiffs") in each of the above-referenced related matters (the "Cases"). I submit this letter-motion to seal in connection with KG LLP's motion pursuant to Local Civil Rule 1.4 for leave to withdraw as counsel for the Nefertiti Entities.

To preserve the confidentiality of the attorney-client relationship, I respectfully request that the Court permit all additional responses and exhibits related to KG LLP's respective motions for leave to withdraw including, but not limited to, documents related to Ms. Kumaran's November 17, 2023 filing in Case No. 1:20-cv-03873 [Docket No. 239], to be filed under seal for *in camera* review and consideration, *i.e.*, with complete copies of the motion provided to the Nefertiti Entities but not any of the other parties. *Team Obsolete Ltd. v. A.H.R.M.A. Ltd.*, 464 F.Supp.2d 164, 165 (E.D.N.Y. 2006) (granting motion to withdraw upon *in camera* review holding "documents in support of motions to withdraw as counsel are routinely filed under seal where necessary to preserve the confidentiality of the attorney-client relationship between a party and its counsel, and ... this method is viewed favorably by the courts").

Respectfully submitted,

/s/ Randy E. Kleinman

RANDY E. KLEINMAN  
For the Firm

Cc: All counsel (*via ECF*)

Nefertiti Entities (*via* Email at [samantha@timetricrisk.com](mailto:samantha@timetricrisk.com))